

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 5202, 5203, 5204

**NOTICE OF DEBTORS' EXHIBIT LIST AND INTENT TO OFFER  
WITNESS TESTIMONY AT THE HEARING ON JANUARY 31, 2024  
IN CONNECTION WITH THE MOTION OF DEBTORS TO  
ESTIMATE CLAIMS BASED ON DIGITAL ASSETS**

**PLEASE TAKE NOTICE** that FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) hereby provide the following information regarding the witnesses they intend to present, and the list of the potential exhibits that they may seek to introduce, at the hearing scheduled on January 31, 2024 (the “Hearing”) on the *Motion of the Debtors to Estimate Claims Based on Digital Assets* [D.I. 5202] (the “Motion”)<sup>2</sup>:

**INFORMATION ON WITNESS NUMBER ONE**

1. Name and title of witness: Edgar W. Mosley II, Managing Director at Alvarez & Marsal North America, LLC, financial advisors to the Debtors.
2. Scope of testimony: Mr. Mosley will testify regarding the undue delay that would be caused by liquidation of all Claims based on Digital Assets.
3. Direct testimony of witness: Mr. Mosley’s direct testimony has been presented through the *Declaration of Edgar W. Mosley II in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 6728, Ex. C]. The Debtors may elicit additional direct or rebuttal testimony from Mr. Mosley at the Hearing.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Capitalized terms used but not otherwise defined herein are to be given the meanings ascribed to them in the Motion or the Reply, as applicable.

4. Location and place from which the witness will testify: Mr. Mosley will be available to testify in person.

**INFORMATION ON WITNESS NUMBER TWO**

1. Name and title of witness: Kevin Lu, Director of Data Science & Product at Coin Metrics, Inc.
2. Scope of testimony: Mr. Lu will testify regarding the baseline pricing of certain Digital Assets in connection with the Motion.
3. Direct testimony of witness: Mr. Lu's direct testimony has been presented through the *Declaration of Kevin Lu in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5204]. The Debtors may elicit additional direct or rebuttal testimony from Mr. Lu at the Hearing
4. Location and place from which the witness will testify: Mr. Lu will be available to testify in person.

**INFORMATION ON WITNESS NUMBER THREE**

1. Name and title of witness: Sabrina T. Howell, Associate Professor of Finance at the New York University Stern School of Business.
2. Scope of testimony: Ms. Howell will testify regarding the valuation of Digital Assets as set forth in the Digital Assets Conversion Table and the contents of her Expert Report.
3. Direct testimony of witness: Ms. Howell's direct testimony has been presented through the (a) *Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 5203] and (b) *Supplemental Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets* [D.I. 6728, Ex. D]. The Debtors may elicit additional direct or rebuttal testimony from Ms. Howell at the Hearing.
4. Location and place from which the witness will testify: Ms. Howell will be available to testify in person.

**EXHIBITS**

In connection with the Hearing on the Motion, the Debtors may seek to use any one or more of the following documents:

<b>Ex. #</b>	<b>Description</b>
1.	<i>Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets</i> [D.I. 5203]
2.	Expert Report of Sabrina T. Howell, dated December 27, 2023 [D.I. 5203-1]
3.	<i>Declaration of Kevin Lu in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets</i> [D.I. 5204]
4.	<i>Supplemental Declaration of Sabrina T. Howell in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets</i> [D.I. 6728, Ex. D]
5.	<i>Declaration of Edgar W. Mosley II in Support of the Motion of Debtors to Estimate Claims Based on Digital Assets</i> [D.I. 6728, Ex. C]
6.	<i>Amended Schedules/Statements - Jointly Administered Entity filed: Sch. E-F, Decl. Concerning Debtors Schs. (FTX EU Ltd. Case No. 22-11166)</i> [D.I. 1760]
7.	<i>Amended Schedules/Statements – Jointly Administered Entity filed: Sch. E-F, (FTX EU Ltd. Case No. 22-11166 – Schedule F Attachment F-1)</i> [D.I. 1761]
8.	<i>Amended Schedules/Statements filed: Sch. E-F, Decl Concerning Debtors Schs. for FTX Trading Ltd. (Case Number: 22-11068)</i> [D.I. 6290]
9.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-1)</i> [D.I. 6291]
10.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-2)</i> [D.I. 6292]
11.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-3)</i> [D.I. 6293]
12.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-4)</i> [D.I. 6294]
13.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-5)</i> [D.I. 6295]

14.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-6) [D.I. 6296]</i>
15.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-7) [D.I. 6297]</i>
16.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-8) [D.I. 6298]</i>
17.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-9) [D.I. 6299]</i>
18.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-10) [D.I. 6300]</i>
19.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-11) [D.I. 6301]</i>
20.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-12) [D.I. 6302]</i>
21.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-13) [D.I. 6303]</i>
22.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-14) [D.I. 6304]</i>
23.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-15) [D.I. 6305]</i>
24.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-16) [D.I. 6306]</i>
25.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-17) [D.I. 6307]</i>
26.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-18) [D.I. 6308]</i>
27.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-19) [D.I. 6309]</i>
28.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-20) [D.I. 6310]</i>
29.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-21) [D.I. 6311]</i>

30.	<i>Amended Schedules/Statements filed: Sch. E-F (FTX Trading Ltd. Case No. 22-11068 - Schedule F Attachment F-22) [D.I. 6312]</i>
31.	<i>Amended Schedules/Statements filed: Sch. E-F, Decl Concerning Debtors Schs. (Quoine Pte Ltd - Case No. 22-11161) [D.I. 6313]</i>
32.	<i>Amended Schedules/Statements filed: Sch. E-F (Quoine Pte Ltd Case No. 22-11161 - Schedule F Attachment F-1) [D.I. 6314]</i>
33.	<i>Amended Schedules/Statements filed: Sch. E-F, Decl Concerning Debtors Schs. (West Realm Shires Services Inc. Case No. 22-11071) [D.I. 6315]</i>
34.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-1) [D.I. 6316]</i>
35.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-2) [D.I. 6317]</i>
36.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-3) [D.I. 6318]</i>
37.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-4) [D.I. 6319]</i>
38.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-5) [D.I. 6320]</i>
39.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-6) [D.I. 6321]</i>
40.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-7) [D.I. 6322]</i>
41.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-8) [D.I. 6323]</i>
42.	<i>Amended Schedules/Statements filed: Sch. E-F (West Realm Shires Services Inc. Case No. 22-11071 - Schedule F Attachment F-9) [D.I. 6324]</i>

### **RESERVATION OF RIGHTS**

The Debtors reserve all rights to: (i) amend and supplement this exhibit and witness list at any time at or prior to the Hearing; (ii) use additional exhibits for purposes of rebuttal or impeachment and to supplement the foregoing exhibit list as appropriate; (iii) rely upon and use

as evidence (a) any exhibits included on the exhibit lists of any other party-in-interest and (b) any pleading, hearing transcript, order, or other document filed with the Court in these Chapter 11 Cases or any adversary proceeding; (iv) cross examine any and all witnesses proffered at the Hearing; and (v) call any rebuttal witnesses as the Debtors may deem necessary at the Hearing.

Dated: January 28, 2024  
Wilmington, Delaware

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